

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:22-CV-22518-DPG

MOBB HEALTH CARE LTD.,

Plaintiff,

vs.

FELIX GERSHGORIN,
KLARA GERSHGORIN, and
INNO MEDICAL, LLC.

Defendants.

**PROPOSED SCHEDULING ORDER SETTING
CIVIL TRIAL DATE AND PRETRIAL SCHEDULE**

THIS CAUSE is set for trial during the Court's two-week trial calendar beginning on **JANUARY 29, 2024**. The **Calendar Call** will be held at **9:30 a.m. on Wednesday, JANUARY 24, 2024**. A Status Conference will be held at 10:00 a.m. on Wednesday, September 20, 2023.

The parties shall adhere to the following schedule:

1. Joinder of any additional parties and filing of motions to amend the complaint by	11/18/2022
2. Written list containing the names and addresses of all fact witnesses intended to be call at trial by	6/10/2023
3. <i>Plaintiff shall serve its Infringement Contentions by¹</i>	12/2/2022
4. <i>Defendants shall serve their Invalidity Contentions and Non-Infringement Contentions by</i>	1/13/2023
5. <i>Parties exchange list of proposed terms for claim construction with proposed constructions and extrinsic evidence by</i>	2/3/2023
6. <i>Parties file opening claim construction briefs by</i>	2/24/2023

¹ Dates added to Scheduling Order in italics for patent claim construction deadlines.

7. <i>Parties file responsive claim construction briefs by</i>	3/13/2023
8. <i>Claim Construction Hearing</i> <i>[Notify the Court if the parties request leave to present testimony at claim construction hearing and the time they are requesting be allocated to them for the hearing]</i>	4/13/2023
9. Party with the burden of proof shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(a) by	5/13/2023
10. Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2) by	6/13/2023
11. Parties shall select a mediator pursuant to Local Rule 16.2 and shall schedule a time, date, and place for mediation by	3/13/2023
12. Fact discovery shall be completed by	7/10/2023
13. Expert discovery shall be completed by	7/10/2023
14. Dispositive motions, including those regarding summary judgment and <i>Daubert</i> , shall be filed by	8/25/2023
15. Mediation shall be completed by	10/20/2023
16. All pretrial motions and memoranda of law, including motions in limine, shall be filed by	10/25/2023
17. Joint pretrial stipulation, proposed joint jury instructions, proposed joint verdict form, and/or proposed findings of fact and conclusions of law shall be filed by	11/29/2023

Dated: October 14, 2022

Respectfully submitted,

<p>KOZYAK, TROPIN & THROCKMORTON <i>Counsel for Plaintiffs</i> 2525 Ponce de Leon Boulevard, 9th Floor Coral Gables, Florida 33134 Tel.: 305-372-1800 Fax: 305-372-3508</p> <p><u>/s/ Michael R. Lorigas</u> Javier A. Lopez, Esq. Fla. Bar No. 16727 jal@kttlaw.com Michael R. Lorigas, Esq. Florida Bar No. 123597 mlorigas@kttlaw.com Rasheed K. Nader, Esq. Florida Bar No. 1002362 rnader@kttlaw.com</p>	<p>JASON B. GILLER, P.A. <i>Counsel for Defendants/Counter-Claim Plaintiffs, Felix Gershgorin, Klara Gershgorin, and Inno Medical, LLC</i> 1111 Brickell Ave. Suite 1550 Miami, FL 33131 Tel: (305) 999-1906</p> <p><u>/s/ Robert M. Schwartz</u> Jason B. Giller, Esq. Fla. Bar No. 77441 jason@gillerpa.com Hilary A. Schein, Esq. Fla. Bar No. 1019115 hilary@gillerpa.com</p> <p>ROBERT M. SCHWARTZ, P.A. <i>Counsel for Defendants/Counter-Claim Plaintiffs, Felix Gershgorin, Klara Gershgorin, and Inno Medical, LLC</i> 2445 Hollywood Blvd. P.O. Box 221470 Hollywood, FL 33022 Tel: (954) 924-0707 Fax: (954) 924-0717</p>
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